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This submission responds to the Commission's letters of February 22, 2013 regarding the committee's Amended October Monthly Report and 12 Day Pre-General Report:

Amended October Quarterly Report

The payment from Jill Normington fro polling was initially paid for by Working Assets Services Fund on behalf of the committee and was reported as an in-kind contribution to the committee on 12/30/11. The polling services were not rendered and the refund was provided directly to the committee by the vendor.

12-Day Pre-General Report

As a general matter, the independent expenditure program undertaken by the committee was for ongoing canvassing activities and not for specific communications. Therefore, the committee was issuing payments for ongoing activities such as payroll, voter lists and phones.

the triggering payment for the 48 hour report was a payment made late on Friday October 12th for a phone dialer to be used subsequent to the 12th. The use of the dialer for which the payment was made was no earlier than October 15th. Therefore, the 48 hour report was timely filed as the dissemination date was no earlier than October 15th.
